

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES**

§

§

**V.**

§

**No. 4:22-CR-612 (8)**

§

**DANIEL KNIGHT**

§

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**UNOPPOSED MOTION TO  
MODIFY CONDITIONS OF RELEASE**

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**TO THE HONORABLE ANDREW HANEN:**

NOW COMES Daniel Knight, through undersigned counsel, and files this Motion to Modify Conditions of Release, to which the Government is unopposed.

As the case has progressed, the Government no longer believes Mr. Knight to present a risk of flight and as such, Knight requests that his GPS ankle monitor be removed as a condition of his release.

**I.**

Mr. Knight is charged with one count of conspiracy to commit securities fraud and one count of securities fraud. He pleaded guilty to Count 1 of the superseding indictment on March 27<sup>th</sup>, 2023, with his remaining count to be dismissed at sentencing. The remaining defendants are set for jury trial on October 23<sup>rd</sup>, 2023.

As a condition of his release on December 13<sup>th</sup>, 2022 a GPS ankle monitor was imposed on Mr. Knight. Since that time, Mr. Knight has meticulously complied with

every condition of bond, has appeared in court as directed, and has remained in the geographic location per the Court's requirements. He is a United States Citizen, resides in the Houston area, and presents no risk of flight.

A separate defendant in a related case, Francis Sabo (4:23-CR-206) has agreed to enter a guilty plea and as such is not imposed with an ankle monitor. Knight has likewise accepted responsibility for his role in the conduct, which is less significant than Mr. Sabo, and removing Knight's requirement of an ankle monitor is appropriate. Given those facts, the Court can be reasonably assured of Knight's appearance and of the safety of the community. 18 U.S.C. §3142(b).

## **II.**

U.S. Probation is unopposed to this request and confirms that Mr. Knight has at all times maintained compliance with his current conditions. The Government is likewise unopposed to the relief requested herein.

## **CONCLUSION AND REQUEST FOR RELIEF**

For the reasons outlined above, Knight respectfully requests this Court remove the requirement that Mr. Knight wear a GPS ankle monitor as a condition of his relief.

Respectfully submitted,

**THE AKERS FIRM, PLLC**

/s/ Cordt C. Akers

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ATTORNEY FOR

DEFENDANT, DANIEL KNIGHT

### CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing via the Electronic Filing System for the Southern District of Texas, which served attorneys for the Government.

/s/ Cordt C. Akers

Cordt C. Akers

### CERTIFICATE OF CONFERENCE

I hereby certify that I have discussed the foregoing matter with the attorney for the Government and they have indicated that they are unopposed to the granting of this motion.

I hereby certify that I have further discussed the foregoing matter with U.S. Probation, who have indicated they are likewise unopposed to the granting of this motion.

/s/ Cordt C. Akers

Cordt C. Akers